

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF ITS REQUEST
TO CONDUCT ORAL CROSS-EXAMINATION OF
KEYSPAN WITNESS BENTLEY (KE-ST-1)
(August 28, 2000)

The United States Postal Service hereby requests that it be permitted to file today, four calendar days late, its request for permission to conduct oral cross-examination of KeySpan witness Bentley regarding his August 23, 2000, supplemental testimony (KE-ST-1).

That request was required to have been filed on August 24, 2000. Undersigned counsel did not return from the hearing room on that day until too late in the day to file a timely notice. Counsel did not obtain a copy of the testimony until Friday, August 25th, but was prevented from reviewing it by the press of other Docket No. R2000-1 supplemental testimony motions practice and the production and filing of updated Library References (USPS-LR-I-477, I-470 and I-481).

Accordingly, the Postal Service requests that it be permitted to file its notice today.

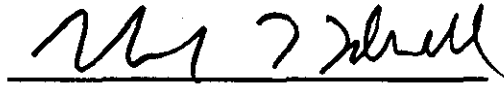
On Saturday, August 26th, undersigned counsel transmitted via e-mail an electronic version of this motion and the request to conduct cross-examination to MMA counsel and witness Bentley, to mitigate any prejudice.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

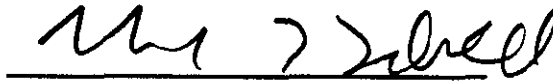
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Michael T. Tidwell

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August 28, 2000